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Our ref: 301241  
Your ref: Reg 18 Local Plan Review



Stroud District Council

For attention of the Planning Policy Team

**BY EMAIL ONLY**

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Dear Planning Policy Team

**Planning consultation: Stroud Local Plan Review including Habitats Regulations Assessment (HRA) and Sustainability Appraisal (SA)**

Thank you for your consultation on the above dated 20 November 2019 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We have divided our response into two separate sections – ‘policy’ and ‘other issues’ as indicated in the instructions on your webpage:

**POLICY**

**CP1 Delivering carbon neutral by 2030**

Natural England recognises the bold and positive step this draft policy represents. We would welcome further dialogue with the Council as more information becomes available to guide ‘next steps’ with regard to specific measures and themes for those aspects of this subject within our remit.

*In the interim please see comments under ES 1 & ES2*

**CP2 Strategic growth & development locations**

*Please refer to our comments under Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA)*

**CP5 environmental development principles for strategic sites**

Policy ends:

‘Where the Council considers it could be likely that the proposal will result in significant adverse environmental effects during the construction phase, a Construction Environmental Management Plan (CEMP) will be required’.

Would a strategic site not warrant a CEMP as a matter of course?

## **Core Policy CP8 New housing**

Ends ...'Major residential development proposals will be expected to enhance biodiversity on site and, where appropriate, through a network of multifunctional green spaces, which support the natural and ecological processes'.

We welcome specific reference to biodiversity on site and multi-functional green infrastructure. Development of the reasoned justification should ensure that 'major development' is defined .

## **CP14 high quality Sustainable Development**

Natural England Welcomes the following new parts of this policy:

*6.3 Proposed changes reflect national policy on biodiversity net gain and the recommendations arising from the Council's Open Space and Green Infrastructure Study*

8. Contribute to the retention and enhancement of important landscape & geological features, biodiversity interests (including demonstrating the relationship to green infrastructure on site and wider networks)
9. Contribute to a sense of place both in the buildings and spaces themselves and in the way in which they integrate with their surroundings including appropriate landscaping, biodiversity net gain, appropriate open space, sport and amenity space provision

## **CP 15 A quality living and working countryside**

Natural England welcomes the criterion regarding:

Where development accords with any of the principles listed above, it will only be permitted in the countryside if:

- ...
- ii) it does not have an adverse impact on natural assets and/or landscape character;

## **Planning for healthy communities:**

### **DHC5 \* New policy \* Well being & healthy communities**

Natural England welcomes this new policy. Scope exists to demonstrate the links between and opportunities arising from this theme and multifunctional green and blue infrastructure through the work of the Gloucestershire Local Nature Partnership (Green Infrastructure Leadership Group).

## **Delivery policies**

### **ES1 - Sustainable construction and design**

&

### **ES2 - Renewable or low carbon energy generation**

Natural England notes the Council's 'Carbon Neutral 2030' commitments. We propose to remain in dialogue with the Council in order to contribute to the development of the plan's reasoned justification text in relation to those themes and issues within our remit during the run up to the next pre-submission stage of the plan.

With regard to the supporting Appendix B maps indicating areas deemed suitable for the development of renewables we advise that further evidence may need to be commissioned regarding impacts and mitigation options in respect of:

- Wild birds forming part of the Severn Estuary Special Area of Protection (SPA) and habitats and species associated with the Severn Estuary Special Area of Conservation (SAC) and Ramsar site designations.
- Bats forming part of the populations designated as the Wye Valley and Forest of Dean Bat sites SAC and Woodchester Park Site of Special Scientific Interest (SSSI).

In addition, with regard to the Cotswolds AONB further dialogue is needed to clarify the Council's draft approach with respect to 'suitable sites' and the size categories of wind turbine dimensions described in the Appendix B map.

The following information sources are relevant and indicate that further dialogue will be needed in order to understand relevant opportunities and constraints:

[https://www.parliament.uk/documents/commons-vote-office/June\\_2015/18\\_June/1-DCLG-Planning.pdf](https://www.parliament.uk/documents/commons-vote-office/June_2015/18_June/1-DCLG-Planning.pdf)

<https://www.gov.uk/guidance/renewable-and-low-carbon-energy>

#### **ES4 Water resources, quality and flood risk**

Natural England welcomes this policy's content. While the detail of the policy theme falls within the EA's remit we recognise and would reinforce the policy's fundamental importance in supporting effective green and blue infrastructure at a range of scales from catchment level to individual sites. Relevant work is being undertaken at a county level through the Local Nature Partnership e.g. Nature Recovery Network mapping. Parallel work on a green infrastructure strategy for the county is also of relevance. Natural England remains committed to dialogue on the multi-functional green and blue infrastructure themes in order to inform the drafting of the reasoned justification element of this policy following close of the consultation.

#### **ES5 Air quality**

We welcome this policy. We note the proposed policy's content and focus on development within the plan area. In order to acknowledge and act on the varied origins of air pollution and therefore the long distances that can be involved Natural England will continue to advise the Council on this theme for interests within our remit. Due to the cross border and cumulative nature of air quality impacts upon the natural environment we will work with the Council and relevant neighbouring authorities to develop the evidence base and identify necessary, proportionate measures.

#### **ES6 Providing for biodiversity and geodiversity**

Natural England welcomes the clear references to biodiversity net gain and the fundamental relationship with ecological networks.

We also welcome clear policy presentation of the mitigation and sites hierarchies.

## **ES7 Landscape character**

We note that no separate Cotswolds AONB policy exists and that the existing policy does not refer to the provisions of the Cotswolds AONB management plan.

We propose that separate policies for the Cotswolds AONB and landscape character are composed and we will liaise with the Council and the Cotswolds Conservation Board after this consultation to progress this dialogue.

## **ES8 Trees, hedgerows and woodlands**

We welcome this policy in principle and in particular for its reference to ecological interests including green infrastructure networks. The policy could be strengthened by reference to the status of veteran trees and ancient woodland as 'irreplaceable habitats'.

## **DES2 Green Infrastructure**

We welcome this new policy. We anticipate that development of the reasoned justification should also support reference to 'blue infrastructure', or alternatively, a glossary explanation of the green and blue infrastructure terms to ensure the policy's meaning and scope is clear. We would draw the council's attention to parallel work being conducted through the Gloucestershire Local Nature Partnership. This is also likely to contribute to this policy's refinement. Natural England would be pleased to continue this dialogue.

## ***OTHER ISSUES***

### **7.0 delivery & monitoring**

7.4 – Working with Partners - We welcome this section of the plan's clear message regarding the need for cross border and partnership/collaborative working to progress the plan.

### **Sustainability Appraisal**

We note and welcome the inclusion within the 6 priority issues of including:

- (i) the protection and enhancement of the countryside and biodiversity
- (ii) the protection of the natural environment

We have the following comments on the cumulative impacts section of the report:

**SA objective 7: To create, protect, enhance, restore and connect habitats, species and/or sites of biodiversity or geological interest.**

We note the SA report's conclusions regarding the cumulative impacts of the plan upon this objective. ('minor positive and significant negative').

Natural England notes the SA conclusion's reference to potentially significant adverse effects upon the Severn Estuary SAC/SPA/Ramsar Site, Rodborough Common SAC and the Cotswold Beechwoods SAC.

Consistent with the plan's HRA report conclusions (please see below) we will continue in dialogue with the Council and key stakeholders regarding the assessment and mitigation of potential impacts upon the Severn Estuary SAC/SPA/Ramsar Site in respect of the proposed new settlement at Sharpness. Similarly we will also continue to advise the Council in relation to:

- (i) The emerging evidence on recreation pressure and its mitigation at the Cotswold Beechwoods SAC, and
- (ii) A wider review of the existing recreation strategies for the Severn Estuary SAC/SPA/Ramsar Site and Rodborough Common SAC.

**SA objective 8: To conserve and enhance the local character and distinctiveness of *landscapes and towns* and provide sustainable access to countryside in the District.**

We note the SA report's conclusions regarding the cumulative impacts of the plan upon this objective. ('minor positive and significant negative'). The report identifies those proposals with potential for significant negative effects on the achievement of this SA objective. Natural England recognises the inherent challenges in relation to locations such as the Stroud Valleys where the Cotswolds AONB designation and its setting lie in very close proximity to the settlements. We would therefore welcome further dialogue with the Council and key stakeholders as necessary.

**SA objective 13: To improve efficiency in *land use* and protection of soil quality through the re-use of previously developed land and existing buildings and encouraging urban renaissance.**

We note the SA report's conclusions regarding the cumulative impacts of the plan upon this objective. ('minor positive and significant negative'). With regard to the sites named in paragraph 6.50:

'Minchinhampton (PS05), Nailsworth (PS07), Leonard Stanley (PS16 and PS42), Stonehouse (PS19 and PS20), Cam (PS24 and PS25), Hardwicke and Hunts Grove (PS30, PS32 and PS43), Whaddon (G2), Berkeley (PS33), Kingswood (PS38 and PS47), Painswick (PS41), Frampton (PS44) and Whitminster (PS45 and PS46) as well as the new settlements at Newtown and Sharpness (PS36) and Wisloe (PS37).'

With respect to higher value soils Natural England would welcome further dialogue with the Council and/or relevant stakeholders, as necessary, in relation to the identification and conservation of 'best and most versatile' agricultural land.

**Habitats Regulations Assessment (HRA)**

**Table 1 – Re: sites screened out – Wye Valley & Forest of Dean Bat Sites SAC**

Please refer to our comments on CP1, ES1 and ES2. Further dialogue over and appraisal of wind turbine development in the district (See Appendix B of the Local Plan Review document) may be needed. We would welcome further dialogue on this matter with the Council.

With regard to the report's proposed 'Actions and recommendations for Regulation 19 stage' Natural England agrees with the proposals for further work on the themes of:

- Recreation
- Air quality
- Water quality
- Urban effects

## Section 10 - Site allocations for new settlements/settlement extensions

### Key issues for development at Sharpness – para 10.11-10.23

Natural England notes the narrative and conclusion stated at Paragraph 10.21 i.e. that an adverse effect on the integrity of the Severn estuary SAC/SPA/Ramsar Site cannot be ruled out at this stage and further work is needed.

#### 12.3 – Re - Functionally linked land.

The ongoing survey work to enable the mapping of land used for feeding and shelter by designated wild birds relates primarily to the Severn Estuary Special Protection Area (SPA).

With regard to the SAC and Ramsar Site it should be noted that these designations include a suite of migratory fish which spend a part of their life cycle in the watercourses of the Severn hydrological catchment. As a result the River Severn and its tributaries (including tributaries flowing directly into the wider estuary such as the R.Frome) constitute 'functionally linked watercourses'.

For any queries relating to the specific advice in this letter only please contact me on 020 802 60939. For any new consultations, or to provide further information on this consultation please send your correspondence to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

